

1 WEIL, GOTSHAL & MANGES LLP
2 Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)
3 Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
4 Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
5 767 Fifth Avenue New York, NY 10153-0119
6 Tel: 212 310 8000
Fax: 212 310 8007

7 KELLER BENVENUTTI KIM LLP
8 Tobias S. Keller (#151445)
(tkeller@kbkllp.com)
Peter J. Benvenutti (#60566)
(pbenvenutti@kbkllp.com)
Jane Kim (#298192)
(jkim@kbkllp.com)
10 650 California Street, Suite 1900
11 San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

13 *Attorneys for Debtors and Reorganized Debtors*

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15 **UNITED STATES BANKRUPTCY COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 **In re:**

19 **PG&E CORPORATION,**

20 **- and -**

21 **PACIFIC GAS AND ELECTRIC**
22 **COMPANY,**

23 **Debtors.**

- 24 Affects PG&E Corporation
 Affects Pacific Gas and Electric Company
 Affects both Debtors

25 * *All papers shall be filed in the Lead Case,*
26 *No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT
ON RESPONSES TO FOURTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (SECURITIES
ACQUIRED OUTSIDE SUBJECT
PERIOD) AND REQUEST FOR ORDER
BY DEFAULT**

[Re: Dkt. No. 10662]

**Resolving Objections Set for Hearing
June 30, 2021 at 10:00 a.m. (Pacific Time)**

REQUEST FOR ENTRY OF ORDER BY DEFAULT

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No. 1996], that the Court enter an order by default on the *Reorganized Debtors’ Fourth Securities Claims Omnibus Objection (Securities Acquired Outside Subject Period)* [Docket No. 10662] (the “**Fourth Securities Claims Omnibus Objection**”).

RELIEF REQUESTED IN THE FOURTH SECURITIES CLAIMS OMNIBUS OBJECTION

The Fourth Securities Claims Omnibus Objection seeks to disallow and expunge the proofs of claim that were filed by PG&E security holders who do not purport to have purchased or otherwise acquired PG&E securities during the period April 29, 2015 through November 15, 2018 and who did not file a claim prior to the original bar date of October 21, 2019. These claims are listed in Exhibit 1 to the Fourth Securities Claims Omnibus Objection.

NOTICE AND SERVICE

The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors' Fourth Securities Claims Omnibus Objection (Securities Acquired Outside Subject Period)* [Docket No. 10664] (the “**Notice of Hearing**”). The Fourth Securities Claims Omnibus Objection was also supported by the *Declaration of Edward J. Radetich, Jr. in Support of Reorganized Debtors' Fourth Securities Claims Omnibus Objection (Securities Acquired Outside Subject Period)* [Docket No. 10663] (the “**Declaration**”). The Fourth Securities Claims Omnibus Objection, the Notice of Hearing, and the Declaration were served as described in the *Certificate of Service* of Victor Wong, filed on May 24, 2021 [Docket No. 10709] (the “**Certificate of Service**”). As further described in the Certificate of Service, on May 24, 2021, each holder of a claim listed on Exhibit 1 to the Fourth Securities Claims Omnibus Objection received a notice including the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors’ objection with respect to the applicable claim to be disallowed and expunged.

The deadline to file responses or oppositions to the Fourth Securities Claims Omnibus Objection has passed. The Reorganized Debtors have not received any formal or informal responses.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am a partner with the law firm of Weil, Gotshal & Manges LLP (“Weil”), counsel for the Reorganized Debtors.

2. The Court's docket in the Chapter 11 Cases has been reviewed and Weil has determined that no responses have been filed with respect to the Fourth Securities Claims Omnibus Objection.

WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and expunging the proofs of claim listed in the column headed “Claims to be Disallowed/Expunged” in **Exhibit A** to this Request, which listed claims identical to those in Exhibit 1 to the Fourth Securities Claims Omnibus Objection.

Executed on June 23, 2021 in New York, NY.

WEIL, GOTSHAL & MANGES LLP

KELLER BENVENUTTI KIM LLP

By: /s/ Richard W. Slack

Richard W. Slack

Attorneys for Debtors and Reorganized Debtors